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January 5, 2023

**Via ECF**

Hon. Paul Engelmayer  
Thurgood Marshall  
40 Foley Square  
New York, NY 10007

Re: Sanchez v. E.I.G. Auto Salvage, Inc. et al  
1:21-cv-08266

Your Honor:

This office represents Plaintiff in the above captioned matter. The purpose of this letter motion pertains to Plaintiff's motion to compel Defendants to provide certain documents in their possession and, in addition, simply respond to this office.

As the Court is aware, Defendants requested a conference pertaining to Eliazan Cruz's purported actions at E.I.G. Auto Salvage Inc. ("EIG") and his relationship with the owner of Avery-1 Recycling, Mr. Julio Baez. As the e-mail correspondence reflects, I have made multiple attempts to have discussions with Defendants as to whether they have any documentary evidence in support of their position that Mr. Cruz is employed at Avery-1 Recycling.

Mr. Whalen has put in writing that he will not discuss this topic with me any further. And as the e-mail correspondence further reflects, I specifically informed Mr. Whalen that I did not want to have to trouble the Court as to this issue, yet he still refuses to respond.

I am requesting that the Court order Defendants to provide all documents in their possession as it relates to Mr. Cruz's purported employment at Avery-1 Recycling. Such documents would include, but is not limited to, videos or photographs. As the Court stated in the last conference that this can be an issue addressed at the trial, I think it is equitable for Defendants to produce all documentation in their possession.

Respectfully

/s/ Jacob Aronauer

Jacob Aronauer

*Attorney for Plaintiff*

**Via ECF**

*All attorneys on Record*

The Court directs defendants to respond by Monday,  
January 9, 2023.

SO ORDERED.



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PAUL A. ENGELMAYER

United States District Judge

January 6, 2023